

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

STATE OF NEW MEXICO, EX REL.  
RAÚL TORREZ, ATTORNEY GENERAL,

Plaintiff,

- v. -

META PLATFORMS, INC.; INSTAGRAM, LLC;  
META PAYMENTS, INC.; META PLATFORMS  
TECHNOLOGIES, LLC; and MARK  
ZUCKERBERG,

Defendants.

**PLAINTIFF'S RESPONSE TO  
MOTION FOR EXTENSION OF  
PAGE LIMITS**

Civil Action No. 1:23-cv-01115-  
MIS-KK

*Removed from First Judicial District  
Court, County of Santa Fe, New  
Mexico, Case No. D-101-CV-2023-  
02838*

**PLAINTIFF STATE OF NEW MEXICO'S RESPONSE TO  
DEFENDANTS' MOTION FOR EXTENSION OF PAGE LIMITS**

Plaintiff the State of New Mexico respectfully submits this Response to the Corporate Defendants'<sup>1</sup> Motion for Extension of Page Limits:

1. On January 22, 2024, the Corporate Defendants filed a Motion seeking to extend the page limits for the Corporate Defendants' Motion to Dismiss to 45 pages. (Dkt. 38.) On January 23, 2024, before the Court had ruled on that motion, the Corporate Defendants filed their 45-page Motion to Dismiss. (Dkt. 39.)

2. As noted in the Corporate Defendants' Motion, the State agreed that the Corporate Defendants could file a 40-page brief, but would not agree to 45 pages. The Corporate Defendants' initial Motion to Dismiss (Dkt. 19) spanned 35 pages, and the State did not believe that the

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<sup>1</sup> As used herein, the term "Corporate Defendants" refers to Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc. and Meta Platforms Technologies, LLC.

additional allegations in its Amended Complaint warranted an additional 10 pages of argument (more than a 25% increase from the original brief), particularly given that Defendants would be filing a second Motion to Dismiss on behalf of Mr. Zuckerberg. The State is also reluctant to agree to substantial enlargements of page limits because of the burden that places on the Court.

3. *To the extent the Court accepts the Corporate Defendants' overlength brief*, the State requests that the Court permit it to file a brief of equal length (45 pages) in response.

4. Defendants have advised that they consent to this request.

RESPECTFULLY SUBMITTED this 25th day of January 2024.

**RAÚL TORREZ  
ATTORNEY GENERAL OF NEW MEXICO**

By counsel,

/s/ Linda Singer  
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**CERTIFICATE OF SERVICE**

I certify that on January 25, 2024, I filed the foregoing electronically with the Clerk of Court using the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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